

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzález@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington DC 20005
Tel: 202.237.2727 / Fax: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SHAWN RABIN (*Pro Hac Vice*)
srabin@susmangodfrey.com
SUSMAN GODFREY
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
Tel: 212.336.8330 / Fax: 212.336.8340

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
COMPEL UBER TO PROVIDE AN
EXECUTED AUTHORIZATION AND
CONSENT FORM FOR THE
280TECHNOLOGIES.SLACK.COM
SITE (DKT. 2182)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
6 to File Under Seal Its Second Supplemental Brief in Support of Its Motion to Compel Uber to
7 Provide an Executed Authorization and Consent Form for the 280technologies.Slack.Com Site
8 (Dkt. 2182).

9 2. I have reviewed the following documents and confirmed that only the portions
10 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibits 3, 4, 6, 7, 8, 10, 11	Blue Highlights

14 3. The blue highlights in Exhibits 3, 4, 6, 7, 8, 10, and 11 contain contact information
15 of company employees and other individuals involved in the case, including personal email
16 addresses and phone numbers. Defendants seek to seal this information in order to protect the
17 privacy of these individuals because this lawsuit is currently the subject of extensive media
18 coverage. Disclosure of this information could expose these individuals to harm or harassment.

19 4. Defendants' request to seal is narrowly tailored to the portions of Waymo's
20 Second Supplemental Brief and supporting exhibits that merit sealing.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this
22 13th day of November, 2017 in San Francisco, California.

23
24 /s/ Thomas J. Pardini
Thomas J. Pardini